

**REMARKS**

Claims 20-25 and 31-46 are pending in this matter. By this Amendment, Applicants are submitting (a) minor amendments to correct minor errors within the drawings, said amendments being submitted herewith in accordance with 37 C.F.R. § 1.123; (b) minor amendments to clarify and correct minor typographical and grammatical errors within the Specification; and (c) amendments to Claims 20-25 and 31-46 to clarify and better define the claimed invention. No new matter is added by this Amendment.

Clean versions of amended Claims 20-25 and 31-46 are provided in Exhibit A for the Examiner's convenience.

a. Drawing/Specification Amendments

Applicants submit amendments to correct minor errors within the drawings, said amendments being submitted herewith in accordance with 37 C.F.R. § 1.123. No new matter is added.

Minor amendments are made to the Specification to correct certain typographical and grammatical errors. No new matter is added.

b. 35 U.S.C. § 103

The Examiner rejected:

(a) Claims 20-25, 33, 35, 38, 39, 40-46 under 35 U.S.C. § 103 as being unpatentable over Orie (U.S. Patent 5,200,863) in view of Sasaki (U.S. Patent 5,034,804) and in further view of Takahashi (U.S. Patent 5,067,029);

(b) Claims 34 and 36 under 35 U.S.C. § 103 as being unpatentable over Orie in view of Sasaki and in further view of Finelli (U.S. Patent 4,937,676);

(c) Claims 31 and 37 under 35 U.S.C. § 103 as being unpatentable over Lang (U.S. Patent 4,963,995) in view of Sasaki; and

(d) Claim 32 under 35 U.S.C. § 103 as being unpatentable over Lang in view of Sasaki and in further view of Watanabe (U.S. Patent 5,032,927).

Applicants respectfully traverse each of the above rejections.

In regard to Claims 20, 40, and 43, the present invention is directed to a camera which provides, generally, the ability to selectively store image information to a first memory or a second memory. The Examiner primarily relies upon Orie as disclosing the present invention.

While Orie may disclose certain limitations of the claimed inventions, Applicants respectfully submit that Orie fails to disclose:

a changer for automatically changing between a first condition, in which image information outputted from said imaging device is stored on said first semiconductor memory, and a second condition, in which image information outputted from said imaging device is stored on said second semiconductor memory.

as set forth in Claim 20.

Orii is directed to a device having a semiconductor memory (24) and a magnetic storage medium (26a). While Orii maintains two storage mediums, Orii fails to teach that either of the storage mediums may be selected to receive image information outputted from an imaging device. Rather, in column 4, lines 39-44, Orii discloses:

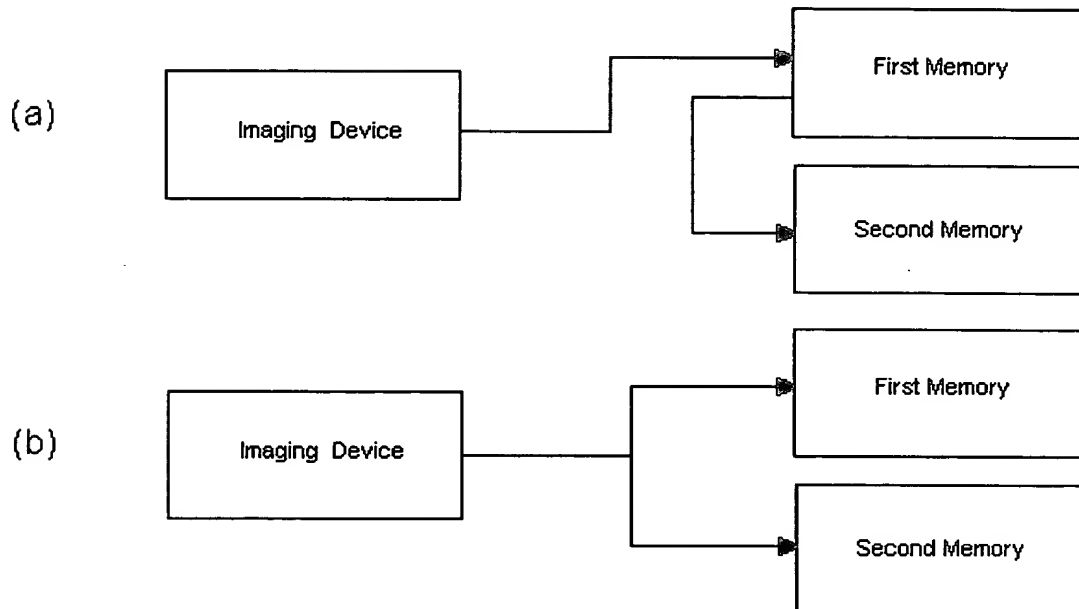
The above-described video tape recorder 25, when connected to the output terminal 19, magnetically records the image signals derived from the memory card 24 of the camera apparatus 10 on a magnetic cassette tape 26 for permanent or long term or short term storage of the image signals corresponding to the images.

Also, at column 13, line 6, a section is provided discussing an operation of transferring image data to the video tape recorder. The section begins:

Referring back to FIGS. 3 and 4, a description will be given of transferring image data to the video tape recorder, which image data has been stored in the memory card 24.

As may be better represented graphically, Orii may utilize two memories to store image data; however, Orii is

limited to (a) as illustrated below. In contrast, the claimed invention of Claim 20 is illustrated as (b):



Similar to Orii, Takahashi fails to disclose, teach, or suggest multiple semiconductor memories, and more particularly, multiple semiconductor memories capable of selectably receiving image information from an imaging device.

With respect to Orii and Takahashi, each of the references is expressly directed to the use of differing storage mediums types so as to overcome apparent operational problems identified by the references' respective inventors. For example, Takahashi discloses a semiconductor memory (40) for high-speed camera operations and an optical card (36)

and magnetic disk (58) for lower-speed, greater volume camera operations.

The Examiner contends Sasaki teaches the general concept of using semiconductor memories with cameras "for storing image signals in order to reduce the size of the overall apparatus." While Applicants may agree that Sasaki discloses a camera having a removable memory card to store image data, Applicants respectfully disagree that such teaching can be used to supplant the disclosed storage mediums of Orie and/or Takahashi. Neither Orie, Sasaki, nor Takahashi include such teaching or suggestion which would enable one skilled in the art to interchange the magnetic tape drive (Orie) or the optical card or the magnetic disc (Takahashi) with the semiconductor memory of Sasaki.

Accordingly, Orie, alone or in combination with Sasaki and/or Takahashi, does not disclose, teach or suggest the claimed invention. Further, Applicants respectfully submit one having ordinary skill in the art could not reasonably combine these references to derive the present invention nor render it obvious.

The above discussion is equally applied to the appropriate portions of amended Claim 40 and the more specifically claimed invention of amended Claim 43 as well as the respective depending claims of Claims 20, 40, and 43.

In regard to Claims 23, 38, and 40, the present invention is directed to a camera which provides, generally,

the ability to selectively direct image information stored on a first memory or on a second memory to a reproduction device. The Examiner primarily relies upon Orii as disclosing the present invention.

While Orii may disclose certain limitations of the claimed inventions, Applicants respectfully submit that Orii fails to disclose:

a changer for selectively changing between a first condition, in which image information on the first memory is outputted to the first reproduction device, and a second condition, in which image information on the second memory is outputted to the first reproduction device.

as set forth in Claim 23.

As expressly taught, no one Orii reproduction device can receive image information output from both a first memory (for example, memory card (24)) and a second memory (for example, video tape (26a)). This is best illustrated in Figure 1 of Orii. Image information output from a memory card (24) may be reproduced on liquid crystal display (23) only, and image information output from video tape recorder (25) may be reproduced on monitor (27) only.

Sasaki and Takahashi fail to disclose, teach, or suggest that which would overcome the deficiencies of Orii. Specifically, Sasaki discloses a camera which saves image information on a removable memory card (15). The memory card may be inserted into a reproducing unit (90) which allows stored image information to be displayed on monitor

(107). Although the reproducing unit includes a frame memory (95), which stores processed image information from the removable memory card during a reproduction operation, there is no disclosure, teaching, or suggestion that such system permits selective output to the monitor from the different memories to the reproducing unit. While Takahashi makes passing reference to a "playback apparatus" (column 8, line 63), there is no specific discussion of a reproduction device, and more particularly, a reproduction device selectively coupled to more than one memory to receive outputted image information.

Accordingly, Orii, alone or in combination with Sasaki and/or Takahashi, does not disclose, teach or suggest the claimed invention. Further, Applicants respectfully submit one having ordinary skill in the art could not reasonably combine these references to derive the present invention nor render it obvious.

The above discussion is equally applied to the more specifically claimed invention of amended Claim 38 and the appropriate portions of amended Claim 40 as well as the respective depending claims of Claims 23, 38, and 40.

In regard to Claims 34 and 36, the Examiner further cites Finelli as teaching a camera having a printing device. While Applicants agree the reference discloses a camera having an integrated printing device, Applicants respectfully submit that Finelli fails to contribute that

which would overcome the noted deficiencies of above-discussed references Orii and Sasaki.

In regard to Claim 31, the present invention is directed to an editing device which provides, generally, a first reception unit, which receives a memory card; a second reception unit, which receives an optical disc; a signal processor to restore processed image information, stored on the memory card, to original image information; and a recorder to record the original image information on the optical disc. The Examiner relies upon Lang in combination with Sasaki.

Lang is directed to a device capable of transferring data from a first storage medium to a second storage medium; however, Lang expressly requires that the improved audio/video recorder-transmitter-editor (10) (i.e., a receiving unit) receive only one storage medium at a time (column 2, lines 8-12, column 2, lines 23-26). Unlike any aspect of the Applicants' claimed invention, Lang reads expanded image information (i.e., original image information) from a first inserted storage medium (23<sub>1</sub>), compresses the read data for storage in an internal, fixed memory (13), allows editing of that information stored in the internal memory, reads the compressed data from the internal memory, expands the stored compressed data, and transfers the expanded data to a second inserted storage medium (23<sub>2</sub>), said second inserted storage medium now occupying the position once occupied by said first storage medium (column 9, lines 18-30). Accordingly, Lang fails to



teach of both a first reception unit and a second reception unit, a signal processor for restoring processed image information from a memory card received by a first reception unit, and a recorder to record restored original image information to an optical disc received by a second reception unit.

While Sasaki discloses a reproducing unit (90) which is capable of receiving a removable memory card, Sasaki fails to include any disclosure, teachings, or suggestions of a reproducing unit having:

- a first reception unit for receiving a removable memory card;
- a second reception unit for receiving an optical disc;
- a signal processor to restore processed image information, stored on the memory card, to original image information obtained in a photographing operation; and
- a recorder to record the restored original image information on the optical disc.

Consequently, Sasaki fails to overcome the noted deficiencies of Lang.

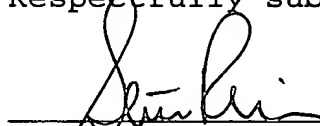
Lang, alone or in combination with Sasaki, does not disclose, teach or suggest the claimed invention. Further, Applicants respectfully submit one having ordinary skill in the art could not reasonably combine these references, whether as cited or with any other known reference, to derive the present invention nor render it obvious.

The above discussion is equally applied to the dependent claims of Claim 31.

Applicants respectfully submit Claims 20-25 and 31-46 are patentably distinct over the cited references and this application is considered to be in condition for allowance. Applicants respectfully request Examiner's reconsideration of this matter in light of this Amendment and withdrawal of all Section 103 rejections.

This Amendment does not result in an increase in either the number of independent claims or the total number of claims, and does not present any multiple dependency claim. Accordingly, no fee based on the number or type of claims is incurred by this Amendment. However, if a fee were to be required, please charge any fee (other than an issue fee) required during the pendency of this U.S. patent application to Deposit Account 18-1260.

Respectfully submitted,



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November 13, 1997